

TRINITY COUNTY PESTICIDE ENFORCEMENT WORK PLAN

CALENDAR YEARS 2011-2013

I. Resources

A. County Resources -

- PYs – .50 FTE total for licensed and unlicensed staff
- 1 licensed position (commissioner) and 1 unlicensed position (program associate)
- Workload expected – 4 Restricted Materials permits, 2-5 NOIs, 4-6 inspections. Hexazinone use is a significant local priority because of an existing court injunction and county history. Investigations/complaints - 1 to 2 per year.
- Expected program changes – no reductions or increases expected. The primary inspection priority remains forestry uses; however, non-restricted herbicide use is a significant concern for the community and has increased somewhat with increased yellow starthistle and other weed growth on small ranchettes. Structural applications still need more emphasis.

II. Core Program Activities

A. Restricted Material Permitting

1. Site Monitoring –

- Most restricted permits are issued for timberland sites and usually for three year periods. Restricted material use is seasonal for brush and weed control in plantations for planting releases and pre-harvest treatments. Permit updates are for acreage or site ownership changes. Updated maps are required at the time of permit issuance or amendment.

2. Hazard Evaluation –

- Updated maps are required at the time of permit issuance and when permit changes occur.
- Hazards are evaluated by type and appropriate mitigations are adopted at the time of permit issuance or amendment. For example, a well is identified, noted on the permit map and engineering or flagging tape is required at the site to identify the well in order to create an appropriate buffer prior to application.

3. Permit Guidance –

- Restricted materials permits are reviewed and issued by the commissioner. DPR's Policy and Procedures Manual is available and used for guidance when needed.

B. Compliance Monitoring

1. Priority Investigations -

- No priority investigations have occurred in the past three years. Procedures developed by DPR and the criteria established in the Cooperative Agreement between CACASA, DPR, and US EPA are followed during such investigations.

2. Routine Investigations/Complaints -

- Investigations are conducted and reported to DPR in a timely manner.
- A complaint log is maintained reporting the date, location, respondent identity, nature of episode, violations, and resolution of the incident.

3. Inspections –

- **Strategy** – Notwithstanding that forest herbicide applications will continue to be an area of significant concern in Trinity County, especially hexazinone applications, another focus will be small grower herbicide work. Structural applications also need some emphasis since seven companies are active in the county.
- When applications are discovered in the field, inspections will be performed as time permits.
- **Review process** –
Inspections are reviewed with the enforcement liaison. Deficiencies are addressed as needed.

C. Enforcement Response

1. Tracking of violation histories –

- Because of the small number of restricted materials permits the commissioner is aware of individual permittees' violation histories. The Enforcement Response Policy will be followed to address repeat and/or serious violations.

2. Review and Decision Process –

- When appropriate violations are reviewed with the DPR enforcement liaison.
- If in a specific instance, enforcement action is not appropriate a decision report will be filed for review by DPR staff.